

INTERVENTION



0000151941

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

COMMISSIONERS
BOB STUMP, CHAIRMAN
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER-SMITH

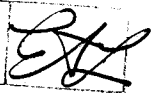
2014 MAR 21 P 3:57

Arizona Corporation Commission

DOCKETED

MAR 21 2014

ARIZONA CORP COMMISSION
DOCKET CONTROL

DOCKETED BY 

IN THE MATTER OF THE
REORGANIZATION OF UNS
ENERGY CORPORATION.

Docket No. E-04230A-14-0011

Docket No. E-01933A-14-0011

MOHAVE ELECTRIC COOPERATIVE,
INCORPORATED'S MOTION TO INTERVENE

ORIGINAL

Mohave Electric Cooperative, Incorporated ("Mohave") through undersigned counsel and pursuant to A.A.C. R14-3-105, hereby moves the Arizona Corporation Commission (the "Commission") for an order allowing Mohave to intervene in the above-captioned proceeding. In support of its motion, Mohave states as follows:

1. Mohave is a public service corporation providing electric service to customers within the state of Arizona and adjacent to UNS Electric, Inc.'s ("UNS Electric") certificated area.
2. UNS Electric is included as part of the reorganization, although the Notice of Reorganization was opened under the UNS Electric docket (E-02404A).
3. Mohave will be directly and substantially affected by this proceeding because UNS Electric and Mohave have several inter-relationships, such as Borderline Agreements, joint use of some facilities, facilities in close proximity to each other, facilities that cross or use the same rights-of-way and potential competition for uncertificated areas located in northwest Arizona.
4. The name, address, telephone number, facsimile number and e-mail address of the attorneys and representatives for Mohave upon whom service of all documents is to be

1 made are:

2 Michael A. Curtis
3 William P. Sullivan
4 Larry K. Udall
5 Curtis, Goodwin, Sullivan,
6 Udall & Schwab, P.L.C.
7 501 East Thomas Road
8 Phoenix, Arizona 85012
9 Phone: 602-393-1700
10 Fax: 602-393-1703
11 E-mail: mcurtis401@aol.com
12 wsullivan@cgsuslaw.com
13 ludall@cgsuslaw.com

Peggy Gillman
Manager of Public Affairs and Energy
Services
Mohave Electric Cooperative, Incorporated
P.O. Box 1045
Bullhead City, Arizona 86430
Phone: 928-758-0575
Fax: 928-763-3315
E-mail: pgillman@mohaveelectric.com

14 5. No other party can represent Mohave's specific interests in these
15 proceedings.

16 6. Mohave's intervention will not unduly broaden the issues from those
17 already raised by the UNS reorganization.

18 WHEREFORE, Mohave respectfully requests that the Commission grant its
19 Motion to Intervene in the above-captioned matter.

20 DATED this 21st day of March, 2014.

21 CURTIS, GOODWIN, SULLIVAN,
22 UDALL & SCHWAB, P.L.C.

23 By: 

24 Michael A. Curtis
25 William P. Sullivan
Larry K. Udall
501 East Thomas Road
Phoenix, Arizona 85012-3205
Attorneys for Mohave Electric Cooperative,
Incorporated

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

**COPY of the foregoing hand delivered/
mailed this 21st day of March, 2014 to:**

**Michael Patten
Roshka Dewulf & Patten, Plc
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004
Attorneys for UNS Energy Corporation**

Lawrence V. Robertson, Jr.
P.O. Box 1448
Tubac, Arizona 85646
Attorneys for Noble Americas Energy
Solutions LLC

1 Thomas Mumaw
2 Melissa Krueger
3 Pinnacle West Capital Corporation
4 P.O. Box 5399, MS 8695
5 Phoenix, Arizona 85072

6 Meghan Grabel
7 P.O. Box 53999, MS 9708
8 Phoenix, Arizona 85072

9 Cynthia Zwick
10 2700 North Third Street, Suite 3040
11 Phoenix, Arizona 85004

12 Nicholas Enoch
13 Jarrett J. Haskovec
14 Lubin & Enoch, PC
15 349 North Fourth Avenue
16 Phoenix, Arizona 85003

17 Timothy M. Hogan
18 ARIZONA CENTER FOR LAW
19 IN THE PUBLIC INTEREST
20 202 E. McDowell Rd., Suite 153
21 Phoenix, Arizona 85004

22 Jeff Schlegel
23 SWEEP Arizona Representative
24 1167 W. Samalayuca Dr.
25 Tucson, Arizona 85704-3224

Michael M. Grant
Gallagher & Kennedy, P.A.
2575 East Camelback Road
Phoenix, Arizona 85016-9225

Gary Yaquinto, President & CEO
Arizona Investment Council
2100 North Central Avenue, Suite 210
Phoenix, Arizona 85004

